



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

BM:BGK
F.# 2019V02754

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 28, 2021

By ECF

United States Magistrate Judge Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. The Real Property and Premises Known as
Deed No. 18,877 et al. - Docket No. 19-CV-05748 (ENV)(RLM)

Dear Judge Mann:

The United States respectfully submits this status report in connection with the above-captioned civil forfeiture proceeding.

I. Background

As set forth in the government's prior status reports dated November 5, 2020, February 2, 2021 and April 30, 2021, a forfeiture complaint was filed against real property located in Mexico (the "Defendant Properties") that were purchased with the proceeds from the sale of illegal narcotics by Rafael Caro Quintero, the principal leader of the Caro Quintero Drug Trafficking Organization in Mexico. On or about October 23, 2019, the United States formally requested assistance from Mexico with respect to the forfeiture of the Defendant Properties pursuant to a Mutual Legal Assistance Treaty (the "MLAT") between our countries. The MLAT request asked Mexico, in part, to restrain the Defendant Properties and to provide timely notice of the forfeiture proceeding to any person who reasonably appeared to have an interest or claim to the Defendant Properties. In addition, the authorities in Mexico were asked to post copies of the Verified Complaint and notice of the action on the Defendant Properties, as required by 18 U.S.C. § 985.

On or about November 25, 2020, pursuant to the MLAT request, prosecutors of the Fiscalia General de la Republica ("FGR") of Mexico, placed notice of the forfeiture action on six of the eight real properties in and around Guadalajara, Mexico. In addition, it is the understanding of the United States that the FGR also summoned the owners of the noticed properties to a meeting relating to Mexico's own investigation of the purchase of said

properties with illegal narcotics proceeds. Based on actions taken by Mexico in response to the MLAT request, on April 1, 2021, the United States filed a motion for Default Judgment and Partial Decree of Forfeiture with respect to five of the eight defendant properties. On April 15, 2021, the Court granted the motion.

The United States is currently in the process of resolving the forfeiture of the three remaining Defendant Properties. Towards that end, on July 22, 2021, the United States filed Corrected Verified Complaint In Rem (the “Corrected Verified Complaint”), which corrected a typographical error in one of the addresses of the remaining three properties referenced in the original Verified Complaint In Rem filed. The United States is currently in the process of providing notice to anyone with a potential interest in that property and will be coordinating with the Mexican authorities to perfect the property’s forfeiture.

II. Conclusion

Based upon the above, the United States is hopeful of reaching a resolution within the next 90 days as to the remaining three properties in the Corrected Verified Complaint.

Respectfully submitted,

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